

AE & T

APPLIED ENVIRONMENTAL TECHNOLOGIES CORPORATION

Administration Bldg. 7, Rm. 240, Davisville, Rhode Island 02854 / (401) 294-4622

Professional Civil, Chemical, Environmental Engineers and Scientists

September 8, 1982

Mr. Thomas Wright, Chief
Division of Air and Hazardous Materials
Room 204, Health Bldg.
75 Davis St.
Providence, RI 02908



SEMS DocID 621052

RCRA RECORDS CENTER

FACILITY OLIN HUNT SPECIALTY

I.D. NO. RID 095976544

FILE LOC. R-1B

OTHER closure/post closure plans

Dear Mr. Wright:

Enclosed are documents relating to "closure" of Philip A. Hunt Chem. Corp's Saylesville and Limerock Facilities. These documents include;

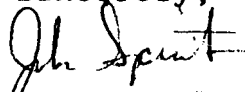
1. Stephen Pozner's (Hunt's Environmental Egr.) letter to you reviewing Hunt's intent to "close" the drum storage areas at both plants so that Hunt would no longer be subject to the Hazardous Waste Treatment and Storage Facility permit regulations at the above referenced facilities.
2. Closure plans for each facility - plans which address "closure" of drum storage areas.
3. For the Limerock facility - certificates of closure, a survey map of the drum storage area, and a notice which is to be recorded with the deed (similar documents will be submitted for the Saylesville Facility following the initiation of closure at the Saylesville Plant).

Please note that within the letters and plans it is indicated that a copy of the manifest used to transport drums from the Limerock Facility on August 30, 1982 would be enclosed, it is not. A copy has been submitted to your office seperately as is routinely done by Hunt for all shipments. Please refer to manifest number RI 001191

for a complete record of waste transport. If unable to
locate please contact me and I will forward another copy.

Thank-you.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Spirito".

John Spirito, P.E.
Principal Engineer

AE & T

APPLIED ENVIRONMENTAL TECHNOLOGIES CORPORATION

Administration Bldg. 7, Rm. 240, Davisville, Rhode Island 02854 / (401) 294-4622

Professional Civil, Chemical, Environmental Engineers and Scientists

September 7th, 1982

Mr. Stephen Pozner
Safety/Environmental Engineer
Philip A. Hunt Chemical Corp.
One Wellington Road
Lincoln, R.I.

Re: Certification of Closure of the
Drum Storage Area at the Limerock
Plant, One Wellington Road,
Lincoln, R.I.

Dear Mr. Pozner:

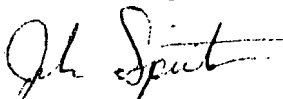
This is to CERTIFY that the Drum Storage Area at your Limerock Facility has been closed in accordance with the Closure plan required for said storage area dated September 1, 1982.

Representatives from this office inspected the drum storage area prior to and following initiation of closure, removal of drums from the site, and have reviewed the manifests used for transport off-site. I am fully satisfied that the drum storage area was properly closed.

Attached please find a Closure survey plan which is to be submitted to the R.I. Dept. of Environmental Management as required by Rule 3.10 of the Treatment and Storage Regulations and the Notice that the area was used to manage hazardous wastes which is to be filed with the deed as required by Rule 3.11 .

Please contact me if you have any questions.

Sincerely,



John Spirito, P.E.
Principal Engineer



PHILIP A. HUNT CHEMICAL CORPORATION
ORGANIC CHEMICAL DIVISION

September 7, 1982

Mr. Thomas E. Wright, Chief
Division of Air and Hazardous Materials
Department of Environmental Management
75 Davis Street
Providence, Rhode Island 02908

Re: Certification of Closure of the Limerock
Plant Drum Storage Area.

Dear Mr. Wright:

I hereby CERTIFY that the drum storage area at our Limerock Plant on One Wellington Rd., Lincoln, R.I. has been completely closed in accordance with the Closure Plan prepared for said storage area by AE & T dated September 1, 1982.

The drums in storage as of August 30, 1981 were transported off-site as the enclosed manifest indicates. There was no spillage or leakage of wastes in the drum storage area requiring decontamination, all concrete surfaces within the diked area are free of any hazardous waste residue. From this date forward all wastes stored in drums shall be transported off-site by a permitted transporter to an approved facility - within 90 days of the waste accumulation start date.

Please contact me if you have any questions concerning this matter.

Sincerely,

Stephen Pozner
Safety/Environmental Engineer



PHILIP A. HUNT CHEMICAL CORPORATION
ORGANIC CHEMICAL DIVISION

Sept. 2, 1982

Mr. David Wilkie
Town Clerk
Town Hall
100 Old River Rd.
Lincoln, R.I. 02865

Re: Notice to be filed with Deed.

Dear Mr. Wilkie:

Would you please record the attached notice with the deed for plat: lot:

This notice is being submitted as required by Rule 3.11 of the Rhode Island Hazardous Waste Treatment and Storage Facilities Rules and Regulations.

If you have any questions concerning how I would like this notice recorded please call me at 333-6114. Attached is a check for \$10.00 which I understand is the cost to record this notice as a separate page with the deed.

Thank you.

Sincerely,

Stephen Pozner
Safety / Environmental
Engineer

NOTICE

THE DRUM STORAGE AREA LOCATED AT THE PHILIP A. HUNT
CHEMICAL CORP. LIMEROCK PLANT, ONE WELLINGTON ROAD,
(PLAT: , LOT:) LINCOLN, RHODE ISLAND, WAS USED TO
STORE WASTE LIQUIDS AND SOLIDS WHICH ARE CONSIDERED AS
HAZARDOUS WASTE BY THE STATE OF RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT.

Date:

Submitted by: Stephen Pozner

Safety/Environmental Engineer
Philip A. Hunt Chemical Corp.
Lincoln, R.I.



PHILIP A. HUNT CHEMICAL CORPORATION
ORGANIC CHEMICAL DIVISION

Mr. Thomas Wright, Chief
Division of Air & Hazardous Materials
Room 204, Health Bldg.
74 Davis St.
Providence, R.I. 02908

Re: Philip A. Hunt Chemical Corp.;
Limerock and Saylesville Plants'
Status - Drum storage closure.

Dear Mr. Wright:

It is our intention to change the hazardous waste drum storage schedule of our facilities located in Limerock and Saylesville so that these facilities are no longer subject to the R.I. Hazardous Waste Treatment and Storage facility Permitting Regulations.

Enclosed are closure plans prepared by our consultant, AE & T Corp., which address "closure" of the drum storage areas at both facilities. With respect to both facilities closure refers to the removal of all hazardous waste currently stored in the drum storage areas and the scheduling of all future shipments of hazardous waste within 90 days of the waste drum accumulation start date.

Upon completion of "closure" of drum storage areas at each facility it is our belief that these facilities will no longer be facilities subject to the Hazardous Waste Treatment and Storage permitting regulations for the following reasons;

- 1) All hazardous waste generated on-site will no longer be stored on-site for periods exceeding 90 days.
- 2) No hazardous waste is or has been received from off-site.
- 3) The treatment of hazardous waste is limited to the treatment of on-site generated waste and in all such cases this treatment involves either reclamation and beneficial reuse or the treatment of aqueous hazardous waste subject to regulation by the local sewer authority.

Based on my understanding of the permitting regulations, both facilities, operating as described above, would not be subject to the hazardous waste treatment and storage facility permit regulations. I therefore request that you remove both facilities from the list of facilities required to obtain hazardous waste treatment and storage permits.



Your concurrence or rejection of the above would be greatly appreciated as would a timely review of the submitted closure plans. Please feel free to contact me concerning the above or to contact Thomas J. Dolce or John Spirito of AE & T to discuss the drum storage closure plans.

Sincerely,

A handwritten signature in cursive script that reads "Stephen Pozner". The signature is written in dark ink and is positioned above the printed name and title.

Stephen Pozner
Safety/Environmental Engineer